

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

OCT 30 2019

JUDGE JOHN J. THARP, JR.
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

No. 18 CR 116

vs.

Judge John J. Tharp, Jr.

ELSTON STEVENSON

PLEA ADDENDUM

1. This Plea Addendum between the United States Attorney for the Northern District of Illinois, JOHN R. LAUSCH, JR., and defendant ELSTON STEVENSON, and his attorney, JERRY BISCHOFF, amends the Plea Declaration made by defendant on September 18, 2018, in case number 18 CR 116, as more fully set forth below.

2. The parties to this Plea Addendum have agreed upon the following amendment to paragraph 5 of the Plea Declaration:

At the time that the defendant possessed the Harrington & Richardson, .32 caliber revolver with serial number 4055 on or about November 22, 2017, he knew that he was a convicted felon and that he had been previously convicted of a crime punishable by a term of imprisonment in excess of one year, including a previous felony conviction for unlawful use of a firearm.

3. Defendant has consulted with counsel about a change in law regarding 18 U.S.C. § 922(g), the sole charge to which he is pleading guilty. He understands that the change in the law that requires the government to prove beyond a reasonable doubt that he knew of his status as a convicted felon on the date that he possessed the Harrington & Richardson, .32 caliber revolver with serial number 4055, and after consultation with counsel, waives his right to insist that the government return a

superseding indictment which includes the allegation that the defendant knew he was a convicted felon on the date of possession.

4. By admitting that he knew he was a convicted felon at the time he possessed the revolver on November 22, 2017, defendant does not waive any argument as to whether his prior convictions, as a matter of law, qualify him for sentencing as an Armed Career Criminal, pursuant to Title 18, United States Code, Section 924(e). Defendant has consulted with counsel and understands that although he is pleading only to a violation of 18 U.S.C. § 922(g), the court may find that defendant qualifies as an Armed Career Criminal and is therefore subject to an enhanced sentence under the provisions of 18 U.S. C. § 924(e). If the court finds that defendant is an Armed Career Criminal, defendant would be subject to a statutory mandatory minimum sentence of 15 years of imprisonment.

5. Defendant understands that this Plea Addendum will be filed with the Court, will become a matter of public record, and may be disclosed to any person.

6. Defendant and his attorney acknowledge that no threats, promises, or representations have been made, nor agreements reached, other than those set forth in this Plea Addendum, to cause defendant to plead guilty or to enter this Plea Addendum.

7. Defendant acknowledges that he has read this Plea Addendum and carefully reviewed each provision with his attorney. Defendant further acknowledges

that he understands and voluntarily accepts each and every term and condition of this Plea Addendum.

AGREED THIS DATE: 10/30/19

John R. Lausch, Jr.
JOHN R. LAUSCH, JR.
United States Attorney

Cornelius A. Vandenberg
CORNELIUS A. VANDENBERG
Assistant U.S. Attorney

Elston Stevenson
ELSTON STEVENSON
Defendant

Jerry Bischoff
JERRY BISCHOFF
Attorney for Defendant